



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Municipality: Scott Township, Pennsylvania MS4
Municipality Address: 1038 Montdale Road #101, Scott, PA 18447
Mailing Address: 1038 Montdale Road #101, Scott, PA 18447

Report Prepared on: 9/7/2021 By: Cassidy Owen,
Date Cassidy Owen, Eastern Research Group

Report Final as of: _____ By: _____, EPA
Date Signature

General Information

Type of Inspection:	MS4 Compliance Inspection
Owner:	Scott Township
Operators:	Scott Township
Permittee:	Scott Township
NPDES Permit No:	PAI132242
NPDES Permit Effective Date:	June 1, 2015
NPDES Permit Expiration Date:	May 31, 2020
Receiving Water(s) and/or MS4:	Leggets Creek, South Branch Tunkhannock Creek, Hull Creek, Kennedy Creek, Lackawanna River
Latitude and Longitude:	41°32'6.00" N, 75°36'45.36" W

Overview of Field Inspections

On August 18, 2021, two inspectors from EPA contractor Eastern Research Group, (hereinafter, EPA Inspection Team) conducted site visit inspections of multiple locations managed under the Scott Township, Pennsylvania (hereinafter, Township) Municipal Separate Storm Sewer System (MS4) program. These in-person site visits complement an EPA offsite compliance audit of the Township's MS4 program conducted August 5, 6 and 10, 2021. Both the offsite audit and site visit inspections were conducted to assess the Township's compliance with the requirements of the *Commonwealth of Pennsylvania Department of Environmental Protection Approval of National Pollutant Discharge Elimination System (NPDES) Individual Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4)* (NPDES Permit No. PAI132242); hereinafter, the Permit). A copy of the Permit is provided in Appendix A.

Approximate Entry Time: 8:00 AM (EDT) **Approximate Exit Time:** 11:00 AM (EDT)

Unique Project Identifier (UPI): 3E21WN139A

TABLE OF CONTENTS

Introduction.....	3
Inspection Process.....	3
Field Observations	4
[MCM-3] MS4 Outfall at Meadow Drive and Laurel Drive (Outfall #2)	4
[MCM-3] Hill Street Outfall Description	7
[MCM-3] Scott Township Municipal Park Outfalls	8
[MCM-5] Municipal Building Rain Garden	9
[MCM-5] Francis Smith & Sons Detention Pond.....	11
[MCM-6] Municipal Salt Storage Shed.....	13
[MCM-6] Municipal Garage.....	15
Field Observation Photos:.....	17

Appendix A: NPDES Individual Permit for Stormwater Discharges from Small MS4s (NPDES Permit No. PAI132242)

INTRODUCTION

Weather and Precipitation:

During the inspection, there was light rain and temperatures averaging approximately 78 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and five days prior are provided in the table below.

Table 1. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches) ¹
MONTDALE 0.8 SE, PA, US US1PALC0011	August 13, 2021	1.09
MONTDALE 0.8 SE, PA, US US1PALC0011	August 14, 2021	0.00
MONTDALE 0.8 SE, PA, US US1PALC0011	August 15, 2021	0.00
MONTDALE 0.8 SE, PA, US US1PALC0011	August 16, 2021	0.00
MONTDALE 0.8 SE, PA, US US1PALC0011	August 17, 2021	0.00
MONTDALE 0.8 SE, PA, US US1PALC0011	August 18, 2021	0.17

INSPECTION PROCESS

Inspection Opening and Closing Conferences

The EPA Inspection Team arrived at the Scott Township Municipal Building at 8:00 a.m. (EDT) for the inspection. Cassidy Owen of Eastern Research Group displayed his Clean Water Act inspector credential to Carl Ferraro, the Township Administrator, at the outset of the inspection and explained that the purpose of the inspection was to make field observations to complement an offsite compliance review of the Township's MS4 program conducted August 5, 6, and 10, 2021. No other Township staff were present during the inspection. David Golobek, Water Quality Specialist with the Pennsylvania Department of Environmental Protection (DEP), was present during the inspection.

The EPA Inspection Team conducted a brief closing conference at the Municipal Garage with the Township Administrator to share preliminary observations prior to leaving the Township at approximately 11:00 a.m. (EDT).

This report includes observations and photographs from inspections conducted at two Township owned and operated facilities, four Township MS4 outfalls, one privately owned and operated best management practice (BMP), and one publicly owned and operated BMP.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

FIELD OBSERVATIONS

[MCM-3] MS4 Outfall at Meadow Drive and Laurel Drive (Outfall #2)

Address/Location: Intersection of Meadow Drive and Laurel Drive (41°29'19.32" N, 75°39'35.64" W)

Relevant Minimum Control Measure (MCM): Outfall

Entry Time: 9:00 AM (EDT) / **Exit Time:** 9:15 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

Permit Appendix A, MCM #3 (Illicit Discharge Detection and Elimination), BMP #4 states, "Following the IDD&E program created pursuant to BMP #1, the permittee shall conduct outfall field screening, identify the source of any illicit discharges, and remove or correct any illicit discharges using procedures under BMP #1.

For renewal permittees, each of the identified regulated small MS4 outfalls shall be screened at least once during each permit coverage term. For areas where past problems have been reported or known sources of dry weather flows occur on a continual basis, outfalls shall be screened annually.

For each outfall, if the screening reveals dry weather flow, the discharge from the outfall and the area around the outfall shall be inspected visually for color, turbidity, sheen, floating or submerged solids; for adverse affects on plants or animals in proximity to the outfall; and for odor. If the outfall produces any odor, or if the visual inspection shows any indication that the discharge may contain pollutants, then samples of the discharge shall be collected for field and/or lab testing of selected chemical and biological parameters as part of a process to determine if the dry weather flow is illicit. Common parameters include: pH; conductivity; E. Coli bacteria; fecal coliform bacteria; metals; suspended solids; dissolved solids; oils; ammonia; surfactants; chlorine; and fluoride.

You shall implement the IDD&E plan that you developed to address any non-storm water discharges. If an outfall does not have any dry weather flow, then sampling and testing are not needed.

For all permittees, outfall inspections need to be prioritized according to the perceived chance of illicit discharges within the outfall's contributing drainage area. Observations of each outfall shall be recorded each time an outfall is screened, regardless of the presence of dry weather flow. Proper quality assurance and quality control procedures shall be followed when collecting, transporting or analyzing water samples. All outfall inspection information shall be recorded on the Outfall Reconnaissance Inventory/Sample Collection field sheet (attached below) excerpted from the *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments* (CWP, October 2004). Adequate written documentation shall be maintained to justify a determination that an outfall flow is not illicit. If an outfall flow is illicit, the actions taken to identify and eliminate the illicit flow also shall be documented.

The results of outfall inspections and actions taken to remove or correct illicit discharges shall be summarized in periodic reports."

[MCM-3] Meadow Drive and Laurel Drive (Outfall #2) Description: The EPA Inspection Team visited Outfall #2 located at the intersection of Meadow Drive and Laurel Drive. Outfall #2 receives stormwater from multiple road inlets in a small subdivision. No commercial or industrial activity is present near this outfall. Stormwater collects beneath a final road inlet and is piped under Laurel Drive to the pipe opening labelled Outfall #2. Outfall #2 discharges just south of Laurel Drive to a grassy ditch that runs south between two houses. The grassy ditch connects to a tributary to Leggetts Creek, approximately 300 feet southeast of the outfall pipe.

The Township Administrator stated that Outfall #2 is on the border of the urbanized area of the Township.

Observation 1: The EPA Inspection Team made the following observations of Outfall #2:

- 1) The EPA Inspection Team requested that the Township perform outfall screenings as they normally would and complete any outfall screening paperwork during the EPA inspection. The township Administrator did not complete outfall screenings or screening paperwork during the EPA inspection.
- 2) The EPA Inspection Team observed the end of a corrugated plastic pipe designated as Outfall #2 (refer to Photograph 1). Outfall #2 discharges to a grassy ditch that runs between two houses into a nearby wooded area. The EPA Inspection Team observed rip rap around the end of the pipe opening with no ditch erosion beyond the area containing rip rap (refer to Photograph 2). The EPA Inspection Team also observed a concrete block inside the end of the outfall pipe with some sediment buildup behind the block. The Township Administrator stated that this block was placed in the pipe to slow the flow of water discharging from the outfall. The EPA Inspection Team observed a small amount of flow discharging from the outfall pipe.
- 3) The EPA Inspection Team observed the closest upgradient inlet from the Outfall #2, located approximately 20 feet north of Outfall #2 on the opposite side of Laurel Drive (refer to Photograph 3). The inlet appeared to be in good condition and free of debris. The EPA Inspection Team observed stormwater flow through the inlet. The EPA Inspection Team also observed surface sheen on Laurel Drive running towards the inlet (refer to Photographs 4 and 5).
- 4) The EPA Inspection Team observed the next upgradient inlet from Outfall #2, located on the opposite side of Laurel Drive and Meadow Drive (refer to Photographs 6 and 7). The EPA Inspection Team observed surface sheen flowing into this inlet. The EPA Inspection Team asked the Township Administrator if the Township would do anything about the surface sheen. The Township Administrator stated that they have the ability to collect samples, but that he was not concerned with this amount of surface sheen. Additionally, the Township Administrator stated that the surface sheen may have emanated from a patch of asphalt used to repair a crack in the pavement (refer to Photograph 8). The Township Administrator stated that the pavement cracks had been repaired last year. The EPA Inspection Team observed that some surface sheen appeared to be emanating from a crack in the pavement, but other

areas of surface sheen were not near cracks in the pavement. The Township Administrator stated that no additional investigation would be performed by the Township.

[MCM-3] Hill Street Outfall

Address/Location: Corner of Hill Drive (41°29'22.22" N, 75°39'29.77" W)

Relevant Minimum Control Measure (MCM): Outfall

Entry Time: 9:17 AM (EDT)

Exit Time: 9:30 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

[MCM-3] Hill Street Outfall Description

The EPA Inspection Team visited an outfall located at the corner of Hill Street, in the same subdivision as Outfall #2, approximately 500 feet to the northwest of Outfall #2. The Township Administrator did not know the outfall number corresponding to the Hill Street Outfall. The Hill Street Outfall receives stormwater from a single road inlet in the subdivision. No commercial or industrial activity is present near this outfall. Stormwater collects in the road inlet and is piped under Hill Street to the outfall. The Hill Street Outfall discharges into a heavily overgrown area towards a tributary to Leggetts Creek, approximately 50 feet south of the outfall.

The Township Administrator stated that the Hill Street Outfall is on the border of the urbanized area of the Township.

Observation 2: The EPA Inspection Team made the following observations of the Hill Street Outfall:

- 1) The EPA Inspection Team requested that the Township perform outfall screenings as they normally would and complete any outfall screening paperwork during the EPA inspection. The Township Administrator did not complete outfall screenings or screening paperwork during the EPA inspection.
- 2) The EPA Inspection Team observed a heavily overgrown area in which the Township Administrator stated the outfall was present. After approximately 10 minutes of searching for the outfall in the overgrowth, the Township Administrator stated that he had found it near a fallen tree in the overgrowth (refer to Photograph 9). The EPA Inspection Team was unable to fully observe the outfall due to the lack of access and vegetative overgrowth.
- 3) The EPA Inspection Team observed the only upgradient inlet piped to the Hill Street Outfall, located approximately 20 feet west of the outfall (refer to Photograph 10). The inlet appeared to be in good condition and free of debris. The EPA Inspection Team observed stormwater flow through the inlet.

[MCM-3] Scott Township Municipal Park Outfalls

Address/Location: 279 Commerce Drive, Olyphant, PA 18447 (41°31'42.50" N, 75°37'12.28" W)

Relevant MCM: Outfall

Entry Time: 10:19 AM (EDT) / **Exit Time:** 10:30 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

[MCM-3] Municipal Park Outfalls Description: The EPA Inspection Team visited two outfalls located at the Scott Township Municipal Park, along Mostowski Road. The Township Administrator did not know the outfall numbers corresponding to the two municipal park outfalls. The south outfall receives drainage from nearby Commerce Drive, and discharges into a ditch along Mostowski Road. The Township Administrator stated that the west outfall receives drainage from a wetland area to the west of the municipal park. The two outfall ditches merge and then run under Mostowski Road before discharging into an unnamed tributary to the South Branch Tunkhannock Creek, approximately 2,000 feet to the northwest.

The Township Administrator stated that the municipal park outfalls are not located within the urbanized area of the Township.

Observation 3: The EPA Inspection Team made the following observations of the Scott Township Municipal Park Outfalls:

- 1) The EPA Inspection Team requested that the Township perform outfall screenings as they normally would and complete any outfall screening paperwork during the EPA inspection. The township Administrator did not complete outfall screenings or screening paperwork during the EPA inspection.
- 2) The EPA Inspection Team observed the outfalls from the point at which the south and west outfall ditches meet (refer to [Photograph 11](#)). The Township Administrator stated that both outfalls have consistent flow, even during dry-weather conditions. The EPA Inspection Team observed stormwater flow through both outfalls. Both outfall ditches contained rip rap stabilization.
- 3) The EPA Inspection Team observed the combined outfall ditches flowing under Mostowski Road (refer to [Photograph 12](#)) and then discharging into an unnamed tributary to the South Branch Tunkhannock Creek (refer to [Photograph 13](#)). The EPA Inspection Team observed stormwater flow in the unnamed tributary to the South Branch Tunkhannock Creek.

[MCM-5] Municipal Building Rain Garden

Address/Location: Behind Municipal Building at 1038 Montdale Road, Scott, PA 18447

Relevant Minimum Control Measure (MCM): Post Construction Stormwater Management

Entry Time: 8:45 AM (EDT)

Exit Time: 8:55 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

Permit Appendix A, MCM #5 (Post Construction Stormwater Management), BMP #6 states that the permittee shall, “Ensure adequate Operation and Maintenance (O&M) of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee).

Within the first year of coverage under this permit, new permittees shall develop and implement a written inspection program to ensure that stormwater BMPs are properly operated and maintained. The program shall include sanctions and penalties for non-compliance. All permittees shall review and update the inspection program annually and shall continue to implement this BMP.

An inventory of PCSM BMPs shall be developed by permittees and shall be continually updated during the term of coverage under this permit as developed projects are reviewed, approved, and constructed. This inventory shall include all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to your regulated small MS4s. The inventory also should include PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. This inventory shall include:

- All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003;
- The exact location of the PCSM BMP (e.g., street address);
- Information (e.g., name, address, phone number(s)) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner;
- The type of BMP and the year it was installed;
- Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources;
- The actual inspection/maintenance activities for each BMP;
- An assessment by the permittee if proper [sic] occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.”

[MCM-5] Municipal Building Rain Garden Description: The EPA Inspection Team visited the publicly owned and operated rain garden located behind the Scott Township Municipal Building. According to the Township Administrator, the rain garden is approximately 4 years old and was installed when the Scott Township Municipal Building was paved. The Township Administrator

stated that there were no structural inlets or outlets (e.g., pipes) in the rain garden; instead, sheet flow from the parking lot enters the rain garden and infiltrates.

The Township Administrator stated that the rain garden is not located within the urbanized area of the Township.

Observation 4: The EPA Inspection Team made the following observations of the Municipal Building Rain Garden:

- 1) The rain garden was located between the Scott Township Municipal Building to the east and a grass soccer field to the west. Ball Road borders the rain garden to the northwest. The South Branch Tunkhannock Creek is located approximately 200 feet to the west of the rain garden.
- 2) The EPA Inspection Team requested that the Township perform BMP inspections as they normally would and complete any self-inspection paperwork during the EPA inspection. The Township Administrator stated that the Township does not perform formal, documented inspections of BMPs; however, he stated that Township staff perform as-needed walkthroughs and maintenance of BMPs. Township representatives did not document the activities conducted during the EPA inspection.
- 3) The EPA Inspection Team observed that the rain garden had no physical drainage structures (e.g., inlet or outlet pipes) associated with it. All captured runoff infiltrates.
- 4) The EPA Inspection Team observed that plants within the rain garden appeared to be in good condition (refer to Photographs 14 and 15). The EPA Inspection Team also observed a synthetic liner beneath the rain garden that appeared to be in good condition (refer to Photograph 16).

[MCM-5] Francis Smith & Sons Detention Pond

Address/Location: 26 Sam's Road, Olyphant, PA 18447 (41°31'58.34" N, 75°38'53.19" W)

Relevant Minimum Control Measure (MCM): Post Construction Stormwater Management

Entry Time: 9:35 AM (EDT)

Exit Time: 9:55 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

[MCM -5] Francis Smith & Sons Detention Pond Description: The EPA Inspection Team visited the privately-owned and -operated detention pond located north of the Francis Smith & Sons facility. According to the Township Administrator, Francis Smith & Sons installs fuel tanks, pumps, and computers for fuel retail stations. The facility consists of two large buildings, outdoor equipment storage, and a large parking lot. The detention pond is split into an east and west side, receiving drainage from the east and west sides of the parking lot, respectively. According to the Township Administrator, the BMP is approximately 5 years old.

The Township Administrator stated that the BMP is located within the urbanized area of the Township.

Observation 5: The EPA Inspection Team made the following observations of the Francis Smith & Sons Detention Basin:

- 1) The EPA Inspection Team requested that the Township perform BMP inspections as they normally would and complete any self-inspection paperwork during the EPA inspection. The Township Administrator stated that the Township does not perform formal, documented inspections of BMPs; however, he stated that Township staff perform as-needed walkthroughs and maintenance of BMPs. Township representatives did not document the activities conducted during the EPA inspection.
- 2) The Township Administrator stated that the Township did not have an ordinance to require private BMP owners to maintain their post construction stormwater management BMPs. The Township Administrator also stated that the Township had never had issues with this private BMP owner maintaining their BMP.
- 3) The EPA Inspection Team observed the east detention basin located approximately 20 feet downhill from the Francis Smith & Sons parking lot (refer to Photograph 17). The basin was almost entirely full of cattails with the exception of a mowed patch of grass closest to the inlet pipe. The inlet pipe consisted of a small plastic corrugated pipe surrounded by rip rap (refer to Photograph 18). The EPA Inspection Team observed stormwater flow from the end of the inlet pipe. The Township Administrator stated that there were no outlet pipes for stormwater leaving the detention basin.

- 4) The EPA Inspection Team observed that the majority of the Francis Smith & Sons parking lot was paved (refer to Photographs 19 and 20). The Township Administrator stated that stormwater from the parking lot mainly moved via sheet flow to the detention basin; however, the parking lot contained a few stormwater inlets that were piped to the east and west detention basins.
- 5) The EPA Inspection Team observed the west detention basin and corresponding inlet pipe (refer to Photograph 21). The EPA Inspection Team observed that the west detention basin and inlet pipe appeared to be identical in design and condition to the east detention basin. As with the east detention basin, the Township Administrator stated that there were no outlet pipes for stormwater leaving the detention basin. All captured runoff infiltrates.

[MCM-6] Municipal Salt Storage Shed

Address/Location: Discovery Drive, Olyphant, PA 18447 (41°32'7.92" N, 75°37'21.00" W)

Relevant Minimum Control Measure (MCM): Pollution Prevention / Good Housekeeping

Entry Time: 10:00 AM (EDT)

Exit Time: 10:15 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

Permit Appendix A, MCM #6 (Pollution Prevention/Good Housekeeping), BMP #2 states the Permittee must “Develop, implement and maintain a written operation and maintenance (O&M) program for all municipal operations and facilities that could contribute to the discharge of pollutants from the regulated small MS4s, as identified under BMP #1. This program (or programs) shall address municipally owned stormwater collection or conveyance systems, but could include other areas (as identified under BMP #1). The O&M program(s) should stress pollution prevention and good housekeeping measures, contain site-specific information, and address the following areas:

- Management practices, policies, procedures, etc. shall be developed and implemented to reduce or prevent the discharge of pollutants to your regulated small MS4s. You should consider eliminating maintenance-area discharges from floor drains and other drains if they have the potential to discharge to storm sewers.
- Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach your regulated small MS4s. You also should review your procedures for maintaining your stormwater BMPs.
- Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/ sand (anti-skid) storage locations and snow disposal areas.
- Procedures for the proper disposal of waste removed from your regulated small MS4s and your municipal operations, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, and other debris.”

[MCM-6] Municipal Salt Storage Shed Description: The EPA Inspection Team visited the municipal salt storage shed located on Discovery Drive. According to the Township Administrator, the salt storage shed is approximately 3 years old. The site also contained crushed stone storage behind the salt storage shed, as well as soil and asphalt road fill in front of the storage shed. The Township Administrator stated that the Township is planning to add another building at this area in the next few years to consolidate their municipal garage and salt storage shed in the same location.

The Township Administrator stated that the municipal salt storage shed is not located within the urbanized area of the Township.

Observation 6: The EPA Inspection Team made the following observations of the Municipal Salt Storage Shed:

- 1) The EPA Inspection Team requested that the Township perform municipal facility self-inspections as they normally would and complete any self-inspection paperwork during the EPA inspection. The Township Administrator stated that the Township does not perform formal, documented inspections of municipal facilities. Township representatives did not document the activities conducted during the EPA inspection.
- 2) The EPA Inspection Team observed that the area surrounding the salt storage shed consists of a gravel lot without any storm drains or BMPs. The EPA Inspection Team observed that the area generally sloped down towards the north, and the Township Administrator stated that all runoff discharges via sheet flow off of the property to the north. The nearest waterbody to the salt storage shed is the South Branch Tunkhannock Creek, approximately 2,000 feet to the northeast through a heavily wooded area.
- 3) The EPA Inspection Team observed the salt storage shed (refer to Photograph 22), which appeared to be in good structural condition without visible holes in the roof or walls. The EPA Inspection Team observed no track-out of salt from the entrance of the shed.
- 4) The Township Administrator stated that the two front-end loaders observed at the salt storage shed remain at this facility and that there is no covered storage area for them. The Township Administrator also stated that the Township owns three dump trucks and removable salt spreaders; however, all of these are stored under cover at the municipal garage.
- 5) The EPA Inspection Team observed two piles of asphalt road fill and one pile of soil stored approximately 100 feet west of the salt storage shed (refer to Photograph 23). The piles did not have cover or impermeable containment, and the EPA Inspection Team observed runoff of asphalt road fill to the north.
- 6) The EPA Inspection Team observed five piles of crushed stone located behind the salt storage shed (refer to Photographs 24 and 25). The piles did not have cover or impermeable containment, and the piles were located on the perimeter of the property.

[MCM-6] Municipal Garage

Address/Location: 997 Lakeland Drive, Jermyn, PA 18433 (41°31'59.59" N, 75°36'36.50" W)

Relevant Minimum Control Measure (MCM): Pollution Prevention / Good Housekeeping

Entry Time: 10:35 AM (EDT)

Exit Time: 11:00 AM (EDT)

Participants

Name	Title/Affiliation
Carl Ferraro	Township Administrator, Scott Township
Carlisle Rowlands	Inspector, Eastern Research Group
Cassidy Owen	Inspector, Eastern Research Group
David Golobek	Water Quality Specialist, DEP

[MCM -6] Municipal Garage Description: The EPA Inspection Team visited the municipal garage located on Lakeland Drive. The Township Administrator stated that the Township owns three dump trucks and removable salt spreaders, which are stored at this garage. In addition to vehicles, the Township Administrator stated that the municipal garage is used for storage of small tools and two drums of oil. The Township Administrator stated that minor maintenance such as oil changes are performed in the garage; however, major maintenance is performed by a contractor offsite. The Township Administrator also stated that vehicle washing with chemicals is not performed onsite; however, vehicles are sometimes rinsed with water before being moved into the garage. The Township Administrator stated that the Township is planning to add another building at the Municipal Salt Storage Shed in the next few years and will stop using the current municipal garage.

The Township Administrator stated that the municipal garage is not located within the urbanized area of the Township.

Observation 7: The EPA Inspection Team made the following observations of the Municipal Garage:

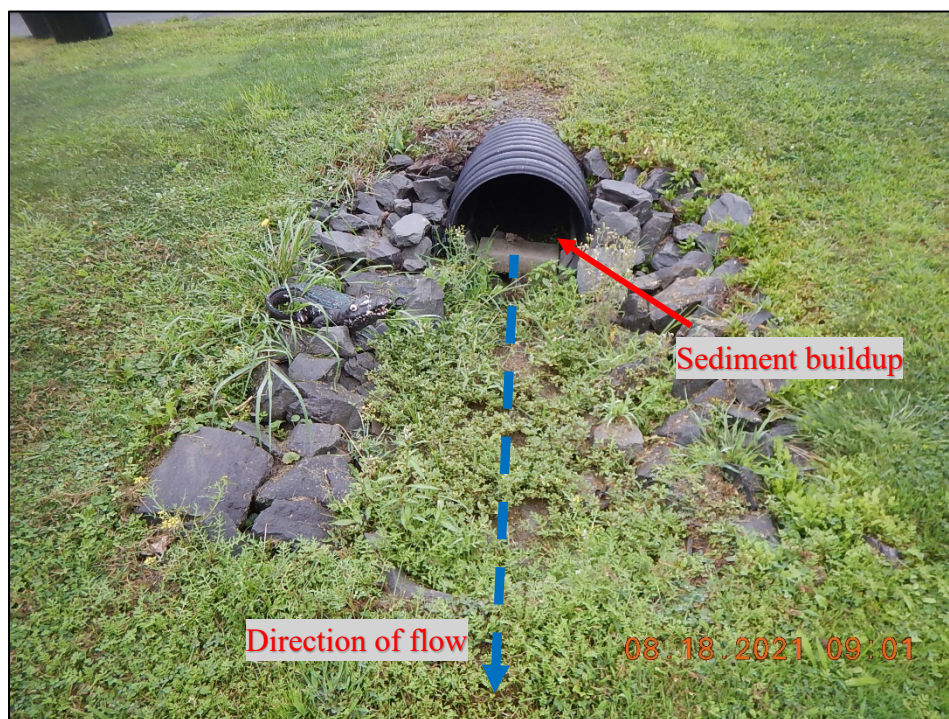
- 1) The EPA Inspection Team requested that the Township perform municipal facility self-inspections as they normally would and complete any self-inspection paperwork during the EPA inspection. The Township Administrator stated that the Township does not perform formal, documented inspections of municipal facilities. Township representatives did not document the activities conducted during the EPA inspection.
- 2) The EPA Inspection Team observed the municipal garage to consist of a building with four vehicle bays and a small gravel parking lot (refer to Photograph 26). The EPA Inspection Team observed no stormwater inlets or BMPs on the property. The EPA Inspection Team observed that the property was flat, with a grass field to the north and a small commercial building to the south. The nearest waterbody to the municipal garage is the South Branch Tunkhannock Creek, approximately 500 feet west of the facility through a wooded area.

- 3) The EPA Inspection Team observed the floor of the municipal garage to have oil stains (refer to Photograph 27). The EPA Inspection Team also observed that the municipal garage contained floor drains; however, they were plugged (refer to Photograph 28). The EPA Inspection Team observed an oil spill kit inside the municipal garage.
- 4) The EPA Inspection Team observed small tool storage along the west wall of the municipal garage (refer to Photograph 29). The EPA Inspection Team also observed two 55-gallon drums of motor oil stored in the southwest corner of the municipal garage (refer to Photograph 30). The drums were not located on spill pallets or within secondary containment. The EPA Inspection Team also observed other small bottles of chemicals stored near the motor oil drums.

FIELD OBSERVATION PHOTOS:



Photograph 1. Outfall #2: (DSCN0701) View, facing south, of the end-of-pipe labelled Outfall #2. The outfall discharges to a grassy ditch between two houses, which connects to a tributary to Leggetts Creek, approximately 300 feet to the southeast.



Photograph 2. Outfall #2: (DSCN0702) View, facing north, of the end-of-pipe labelled Outfall #2. Note the rip rap around the outfall, concrete block inside the pipe, and sediment buildup behind the concrete block.



Photograph 3. Outfall #2: (DSCN0700) View of the closest upgradient inlet from Outfall #2.



Photograph 4. Outfall #2: (DSCN0698) View, facing south, of surface sheen running down Meadow Drive towards the curb inlet shown in Photograph 6.



Photograph 5. Outfall #2: (DSCN0699) Close-up view, facing south, of the surface sheen shown in Photograph 7.



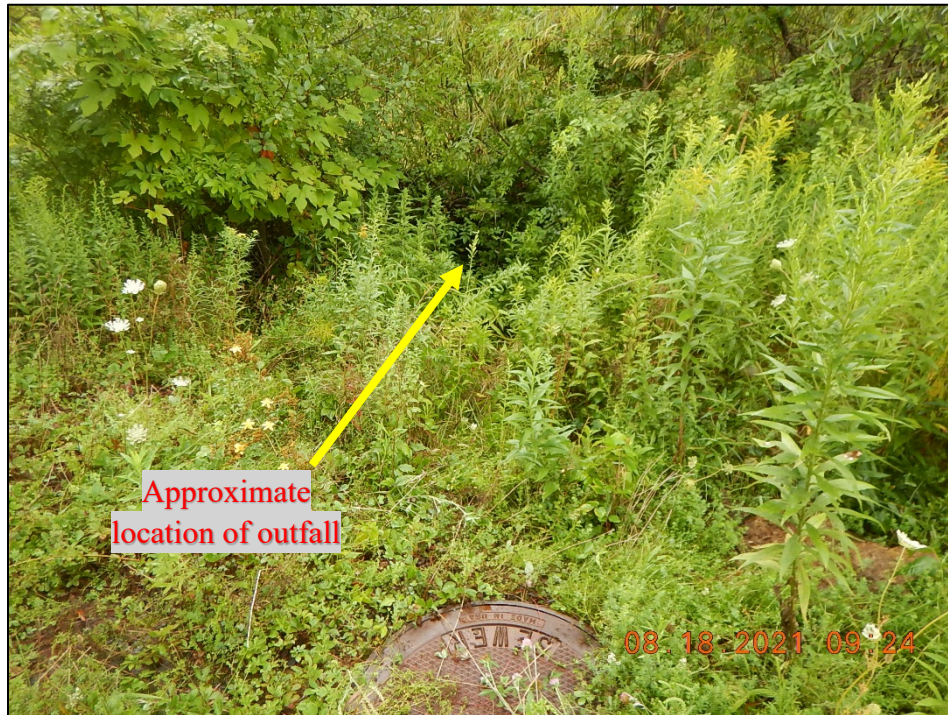
Photograph 6. Outfall #2: (DSCN0703) View, facing south, of the next most upgradient inlet from Outfall #2. Note the surface sheen flowing into the inlet.



Photograph 7. Outfall #2: (DSCN0704) View, facing west, of surface sheen flowing along Laurel Drive to the inlet shown in Photograph 9.



Photograph 8. Outfall #2: (DSCN0705) View of surface sheen that appears to be emanating from a crack in the pavement.



Photograph 9. Hill Street Outfall: (DSCN0707) View, facing west, of a manhole leading to the Hill Street Outfall. The EPA Inspection Team was unable to observe the outfall due to the lack of access and vegetative overgrowth.



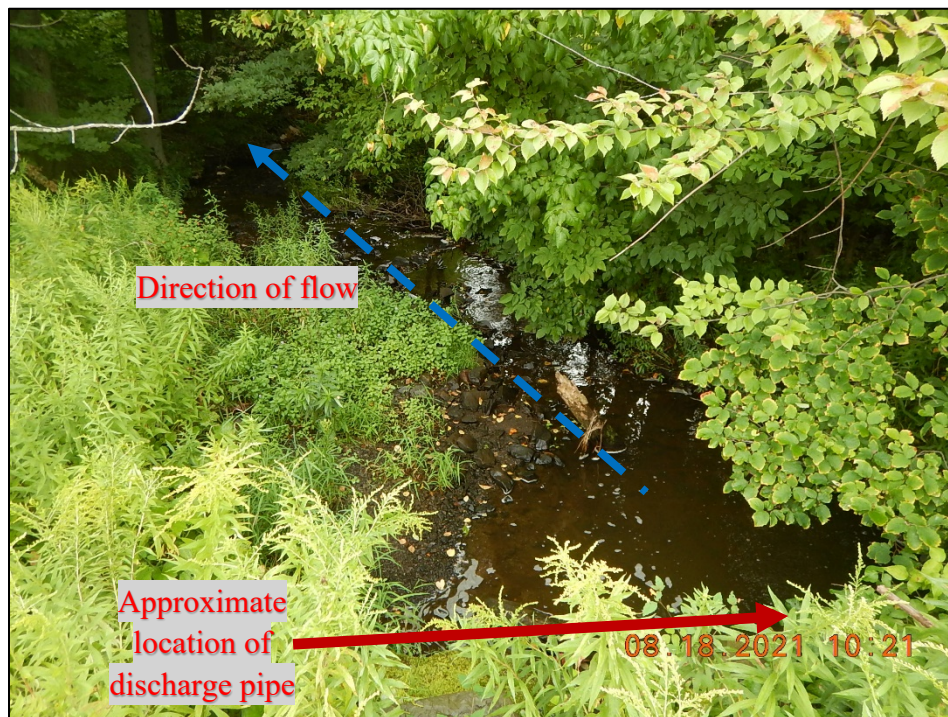
Photograph 10. Hill Street Outfall: (DSCN0709) View of the only upgradient inlet piped to the Hill Street Outfall, located approximately 20 feet west of the outfall. Stormwater runoff was observed going into the inlet at the time of the inspection.



Photograph 11. Municipal Park Outfalls: (DSCN0723) View, facing south, of the south outfall discharging to a ditch and merging with the outfall ditch from the west outfall.



Photograph 12. Municipal Park Outfalls: (DSCN0724) View, facing east, of the south and west outfall ditches merging and flowing under Mostowski Road.



Photograph 13. Municipal Park Outfalls: (DSCN0725) View, facing east, of the combined outfall ditches discharging to an unnamed tributary to the South Branch Tunkhannock Creek.



Photograph 14. Municipal Building Rain Garden: (DSCN0694) View, facing northwest, of the municipal building rain garden.



Photograph 15. Municipal Building Rain Garden: (DSCN0696) View, facing northeast, of the municipal building rain garden. Note the Scott Township Municipal Building and parking lot in the background.



Photograph 16. Municipal Building Rain Garden: (DSCN0697) View of a synthetic liner beneath the municipal building rain garden.



Photograph 17. Francis Smith & Sons Detention Pond: (DSCN0713) View, facing north, of the east detention basin, located approximately 20 feet downhill from the parking lot.



Photograph 18. Francis Smith & Sons Detention Pond: (DSCN0710) View, facing west, of the inlet pipe from the parking lot to the east detention basin. Note the rip rap surrounding the pipe opening.



Photograph 19. Francis Smith & Sons Detention Pond: (DSCN0714) View, facing south, of the parking lot uphill of the east detention basin.



Photograph 20. Francis Smith & Sons Detention Pond: (DSCN0716) View, facing north, of the parking lot uphill of the west detention basin. Note the presence of an inlet flowing to the west detention basin.



Photograph 21. Francis Smith & Sons Detention Pond: (DSCN0717) View, facing north, of the inlet pipe from the parking lot to the west detention basin. Note the rip rap surrounding the pipe opening.



Photograph 22. Municipal Salt Storage Shed: (DSCN0719) View, facing east, of the municipal salt storage shed.



Photograph 23. Municipal Salt Storage Shed: (DSCN0720) View, facing west, of two asphalt road fill piles and one pile of soil stored west of the salt storage shed. Note the lack of cover, impermeable containment, and migration of material from the piles to the north.



Photograph 24. Municipal Salt Storage Shed: (DSCN0722) View, facing southeast, of four crushed stone piles behind the salt storage shed. Note the lack of cover and impermeable containment.



Photograph 25. Municipal Salt Storage Shed: (DSCN0721) Alternate view, facing east, of crushed stone piles behind the salt storage shed.



Photograph 26. Municipal Garage: (DSCN0728) View, facing west, of the Municipal Garage and gravel parking lot.



Photograph 27. Municipal Garage: (DSCN0727) View, facing southwest, of the interior of the municipal garage. Note the presence of oil stains on the floor.



Photograph 28. Municipal Garage: (DSCN0732) View of a drain plug inside of the municipal garage.



Photograph 29. Municipal Garage: (DSCN0731) View of tool storage inside the municipal garage.



Photograph 30. Municipal Garage: (DSCN0730) View of two 55-gallon drums containing motor oil and other small chemical storage. Note that the 55-gallon drums were not located on spill pallets or within secondary containment; however, an oil spill kit was located inside the municipal garage.